



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

# Order Instituting Rulemaking to Establish Policies and Rules to Ensure Reliable, Long-Term Supplies of Natural Gas to California.

R.04-01-025

(Filed January 22, 2004)

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U338-E) ON THE  
PROPOSED DECISION OF ALJ WEISSMAN AND ALTERNATE PROPOSED  
DECISION OF COMMISSIONER PEEVEY**

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Dated: **August 28, 2006**

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**I.**

**INTRODUCTION**

Pursuant to Rule 77 of the California Public Utilities Commission (Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) submits the following comments on the August 8, 2006 Proposed Decision (PD) of Administrative Law Judge Weissman and Alternate Proposed Decision (APD) of Commissioner Peevey in the above-captioned proceeding. As discussed below, both the PD and APD identify several defects in Southern California Gas Company's (SoCalGas) slack capacity measure and proposals. But where the PD considers all the evidence presented, and reaches a balanced and reasoned decision recommending further consideration of several open issues in future proceedings, the APD incongruently ignores recognized deficiencies while reaching conclusions insupportable by the full evidentiary record.

SCE's specific comments are as follows:

- Commissioner Peevey's APD errs in concluding that SoCalGas' slack capacity measure and related proposals are reasonable, and that the total amount of firm backbone transmission capacity on SoCalGas' system is adequate. These findings are inconsistent with and/or contradicted by the evidentiary record and other findings contained in both ALJ Weissman's PD and Commissioner Peevey's APD. In particular, although SCE agrees that there appears to be sufficient physical capacity at this time, there are no rules against withholding capacity from the market. The APD fails to try to resolve this problem, and instead opts for the continuation of the same policies that potentially could lead to constrained conditions at the southern California border during peak-day conditions, such as those experienced during the 2000-2001 energy crisis. In contrast, the PD seeks resolution of this problem in a subsequent proceeding.
- Commissioner Peevey's APD further errs when it finds that the utilities' gas quality tariffs should not include a Wobbe Index rate-of-change requirement. Eliminating and/or not setting a Wobbe Index rate-of-change requirement will have unknown detrimental impacts on emissions and the performance of gas turbines that the Commission should continue to consider
- SCE also comments on three other issues addressed in the APD, where the APD reaches different findings from the PD: 1) whether the gas utilities should consider major changes in demand in assessing infrastructure adequacy; 2) whether the Commission should consider the adequacy and competitiveness of unbundled storage in SoCalGas' service territory; and 3) whether market participants other than gas utilities should be permitted to participate in Natural Gas Working Group meetings.
- SCE further comments that the Core should be required to withdraw gas from storage during times of system peak.

## II.

### **THE ALTERNATE PROPOSED DECISION OF COMMISSIONER PEEVEY ERRS IN MEASURING THE INFRASTRUCTURE ADEQUACY FOR NATURAL GAS UTILITIES**

Commissioner Peevey's APD finds that SoCalGas' slack capacity measure and related proposals are reasonable, and that the total amount of firm backbone transmission capacity on SoCalGas' system is adequate. But these findings are inconsistent with and/or contradict the evidentiary record discussed in the APD, particularly with respect to the APD's findings concerning the use of storage on the SoCalGas system. Both ALJ Weissman's PD and Commissioner Peevey's APD discuss the central role that withdrawing gas from storage on the SoCalGas system has in meeting peak day demand. Indeed, the APD finds the following three Findings of Fact:

**Finding of Fact No. 3:** "It is not enough to know that the combined available pipeline capacity and storage withdrawal rights exceed peak demand by a certain amount. *It is necessary to know that sufficient gas will be stored and that withdrawn gas can be delivered where it is needed when the system is most severely stressed.*" (emphasis added)

**Finding of Fact No. 4:** "For planning purposes, PG&E, SDG&E and SoCalGas appear to have depended on shippers choosing to use storage fully at peak, and either assumed that stored gas could be delivered during peak conditions, or disregarded the issue." (emphasis added)

**Finding of Fact No. 5:** "Enough capacity on the backbone system to satisfy demand on average day is not adequate for system planning purposes if planners cannot depend on stored gas to make up the difference on the most severe peak day." (emphasis added)

Accordingly, there is no dispute that the full use of storage capacity on SoCalGas' system is necessary to meeting peak-day demand. But the APD does not attempt to address the very question it begs concerning the use of storage on SoCalGas' system under peak-day conditions –

that is, whether sufficient gas will be stored and withdrawn under peak-day conditions. This is a serious error in the APD.

As the APD recognizes, SoCalGas is the only storage provider in southern California, and holds 122.1 BcF of storage capacity, 3175 MMcfd of firm withdrawal capacity and 850 MMcfd of firm injection capacity.<sup>1</sup> The APD then poses the question “whether the [SoCalGas’] storage capacity, injection rights, and withdrawal rights are sufficient to meet customer demand and provide a sufficient cushion to respond to emergencies.”<sup>2</sup> Identifying evidence that suggests that there is not sufficient cushion if storage is not utilized by the Core, the APD acknowledges the validity of SCE’s argument that SoCalGas withheld withdrawal capacity during the several days in December 2000 to the detriment of electric ratepayers during the 2000-2001 energy crisis.<sup>3</sup> Indeed, the APD notes that:

SCE raises an important concern: the effect that the failure to withdraw gas from storage during peak periods can have on all other customers. A failure to withdraw at such times may constrain the capacity of the backbone pipeline, and put upward pressure on gas prices at the California border. It reduces the capability of the intrastate system to respond to emergencies.<sup>4</sup>

The APD further acknowledges that the Commission’s “current rules and incentives do little to guard against this result.”<sup>5</sup> Indeed, the APD notes that “there is no requirement that the core use any or all of its storage withdrawal capacity when the system is constrained.”<sup>6</sup>

Rather than choosing to deal with this problem however, the APD merely concludes that is beyond the scope of this proceeding. Leaving an important problem unresolved, it is a straightforward error for the APD to conclude that SoCalGas’ slack capacity proposals are reasonable, and that there is adequate backbone transmission capacity on the SoCalGas system. The APD recognizes this error, as its finding is qualified, “the slack capacity proposals *appear*

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<sup>1</sup> APD, Section I.D.

<sup>2</sup> APD, Section I.D.

<sup>3</sup> APD, Section I.E.

<sup>4</sup> APD, Section I.E. The PD identifies the same concern. APD, Section I.E.

<sup>5</sup> APD, Section I.A.

<sup>6</sup> APD, Section I.A.

reasonable, but we have no quantifiable basis upon which to decide the right number.”<sup>7</sup> Moreover, the APD does not require SoCalGas to provide a peak-day capacity that SoCalGas is willing to stand by without qualification. It does not make sense for the Commission to conclude that there is adequate infrastructure, when it does not know the peak-day capacity of the SoCalGas system. The Commission must resolve the issues raised in this proceeding with rigorous analysis, not qualitative generalizations that conveniently ignore an important problem.

The APD further errs by misconstruing what SCE has proposed in this proceeding. The APD incorrectly suggests that SCE has proposed a slack capacity measure that would required massive expansion of SoCalGas’ receipt point/backbone transmission system in order to add capacity necessary to handle extreme intra-year conditions.<sup>8</sup> This is not what SCE has proposed in this proceeding.

SCE has not proposed a specific slack capacity measure, other than to point out that the measure proposed by SoCalGas is flawed because it does not account for actual variability that occurs on SoCalGas’ system during the year.<sup>9</sup> All parties agree that the SoCalGas system is designed to meet peak load through a combination of flowing supplies and storage withdrawal. SCE recommends that the infrastructure design criteria adopted in this proceeding consider extreme year and extreme within-year conditions, and the ability of the combination of storage withdrawal and flowing supplies to meet peak demand. A design criteria that considers peak day conditions is more rigorous than SoCalGas’ approach of isolating its transmission system and judging its adequacy on a flat average daily demand.<sup>10</sup>

In addition, SCE has not proposed any expansion of SoCalGas’ system at this time. As noted above, SoCalGas has wide discretion regarding its use of storage on behalf of the Core under existing tariffs. And this operating discretion (e.g. a failure to withdraw gas from storage) can have detrimental impacts during peak-day conditions, as the APD and PD both recognize.

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<sup>7</sup> APD, Finding of Fact ¶ 11.

<sup>8</sup> APD, Section I.A.

<sup>9</sup> SCE Opening Brief, Section IV.A.1 at 7.

<sup>10</sup> SCE Opening Brief, Section IV.A.1 at 9.

SCE has therefore recommended that the Commission implement guidelines that limit this operating discretion in order to assure system reliability under certain peak-day conditions.

In contrast to the APD, ALJ Weissman's PD seeks to resolve the problems identified by SCE. The PD does not like how the utilities have assumed that full storage withdrawal capacity represents a reliable resource for planning standards (and says it makes no sense for utilities to assume this).<sup>11</sup> The PD thus directs utilities to make new system adequacy filings in a new proceeding to consider the probability of peak period storage withdrawal and deliverability of withdrawn gas when assessing the adequacy of the entire system.<sup>12</sup> The PD directs the utilities to propose quantifiable slack capacity standards based on specific characteristics of their respective systems and the need to ensure adequate service in times of emergency.<sup>13</sup>

### III.

#### **THE ALTERNATE PROPOSED DECISION OF COMMISSIONER PEEVEY ERRS IN FINDING THAT THE UTILITIES' GAS QUALITY TARIFFS SHOULD NOT INCLUDE A WOBBE INDEX RATE-OF-CHANGE REQUIREMENT**

Commissioner Peevey's APD further errs when it finds that the utilities' gas quality tariffs should not include a Wobbe Index rate-of-change requirement.<sup>14</sup>

The APD's decision is inconsistent with and/or contradicted by the evidentiary record and other findings contained in the APD. Indeed, the APD acknowledges the potential impact high Wobbe gas may have on emissions and the performance of end-use equipment, and that the Commission should continue to consider this impact.<sup>15</sup> Eliminating and/or not setting a Wobbe Index rate-of-change requirement may have unknown detrimental impacts on emissions and the performance of end-use equipment that the Commission should consider. By not setting a rate-of-change requirement, the APD misses the significance of setting the rate-of-change

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<sup>11</sup> PD, Findings of Fact ¶¶ 4-5.

<sup>12</sup> PD at 3.

<sup>13</sup> PD at 3.

<sup>14</sup> APD, Section IX.H.

<sup>15</sup> APD, Findings of Fact ¶ 64.

requirement. Although it appears as though most end-use equipment can be recalibrated to use hotter-burning gas, a rate-of-change limitation is necessary to protect customers located at the “null point” whose equipment will have to switch from domestically produced gas to re-gasified LNG, and vice-versa, potentially on an hourly, daily, or weekly basis.<sup>16</sup> The APD’s assumption that end-users operating at “null points” can simply recalibrate equipment as necessary to adjust to for any change in gas quality at “null points” appears to be largely uninformed. The APD’s finding that recalibrating turbines and/or other end-use equipment is “routine” is not supported by the evidence, which shows that the recalibration of this equipment is specialized and expensive.<sup>17</sup> Indeed, the equipment needed to deal with fluctuating gas quality does not even exist today and is still being developed by GE.<sup>18</sup>

#### IV.

#### **OTHER ISSUES**

There are several important differences between ALJ Weissman’s PD and Commissioner Peevey’s APD that SCE has noted.

The PD does not like the fact that in assessing system adequacy, the utilities do not consider the impact of major changes in demand (e.g. the potential loss of a nuclear unit).<sup>19</sup> The APD agrees with SoCalGas and PG&E that the utilities cannot plan for all extreme events and that such planning would lead to an over-build of infrastructure.<sup>20</sup> The APD errs in reaching this decision. As the PD correctly stated, “an electric utility must plan for the loss of a nuclear plant because it is one of the largest single source of electric generation. A gas utility must plan for such a loss because the alternative source of generation is likely to be gas-fired”<sup>21</sup> This is especially true given the significant time needed to establish new storage capability.<sup>22</sup>

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<sup>16</sup> Exs. 122 and 123.

<sup>17</sup> Exs. 122 and 123.

<sup>18</sup> Exs. 122 and 123.

<sup>19</sup> PD, Findings of Fact ¶¶ 17-19.

<sup>20</sup> APD, Findings of Fact ¶¶ 21.

<sup>21</sup> PD, Section I.D.

<sup>22</sup> PD, Section I.D.



The PD raises concerns about the adequacy and competitiveness of unbundled storage in SoCalGas' service territory and orders SoCalGas to file tariffs creating a cost-based recourse rate for storage customers willing to make multi-year commitments. The PD also says it has not received rigorous analysis to determine whether storage and backbone infrastructure is sufficient.<sup>23</sup> The APD finds no reason to believe that storage facilities are inadequate and says changes to storage charges are better addressed in BCAPs.<sup>24</sup> SCE prefers the PD's approach on this issue, given the usual scope of BCAP proceedings.

There is some debate as to who can attend certain meetings of the Natural Gas Working Group. The PD suggests that all meetings should be open to the public and market participants, while the APD adopts a CEC proposal limiting some meetings to just state agency representatives and the investor-owned gas utilities. The PD has the better approach concerning Natural Gas Working Group meetings. SCE should not be the only investor-owned utility excluded from these meetings, particularly given the large volumes of natural gas that it purchases for electric generation on behalf of its customers.

Finally, both the PD and APD find that "electric generators should do their part to fill storage fields, and to withdraw gas during times of system peak." This finding is flawed, in that it is silent as to the obligations of the Core to withdraw gas during times of system peak. The Core should be required to withdraw gas from storage during times of system peak. As both the

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<sup>23</sup> PD, Findings of Fact ¶¶ 22-23.

<sup>24</sup> PD, Findings of Fact ¶¶ 24 and 26.

PD and APD note, “a failure to withdraw at such times may constrain the capacity of the backbone pipeline, and put upward pressure on gas prices at the California border.”<sup>25</sup>

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August 28, 2006

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<sup>25</sup> PD, Section I.E; APD, Section I.E.

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U338-E) ON THE PROPOSED DECISION OF ALJ WEISSMAN AND THE ALTERNATE PROPOSED DECISION OF COMMISSIONER PEEVE on the attached service list(s).

Transmitting the copies via e-mail to all parties who have provided an e-mail address.  
First class mail will be used if electronic service cannot be effectuated.

Executed this **28<sup>th</sup> day of August, 2006**, at Rosemead, California.

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Monday, August 28, 2006

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Monday, August 28, 2006

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